

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**
Harrisburg Division

IN RE: DWAYNE LEE CARR and NIURCA ZENAIDA CARR	Case No. 1:17-bk-00987-HWV Chapter 13
Freedom Mortgage Corporation, Movant vs. DWAYNE LEE CARR and NIURCA ZENAIDA CARR, Debtor	

NOTICE OF MORTGAGE FORBEARANCE DUE TO THE COVID-19 PANDEMIC

NOW COMES Creditor, Freedom Mortgage Corporation (“CREDITOR”), by and through undersigned counsel, and hereby submits Notice to the Court of the forbearance offer with respect to Creditor’s residential mortgage claim which is identified on the Court’s claim register as Claim No. 22 (the “Claim”).

The Claim is eligible for a forbearance period based upon the Debtor(s) material financial hardship caused by the COVID-19 pandemic. As a result, the Debtor(s) shall not be required to tender mortgage payments to Creditor that would come due on the Claim starting 07/01/2021 through 09/30/2021.

Creditor, at this time, does not waive any rights to collect the payments that come due during this forbearance period.

Debtor(s) will resume Mortgage payments beginning 10/01/2021 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”).

Prior to the expiration of the forbearance period, Debtor(s) must either (1) request additional forbearance time under Local Rule, State or Federal Law; (2) enter inter loss mitigation with Creditor; or (3) file an Amended Chapter 13 Plan which cures the arrears resulting from the forbearance period over the remainder of the Chapter 13 Plan.

21-02750 BKOBJ02

Creditor does not waive its rights under the terms of the note and mortgage or under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

Respectfully Submitted,

/s/ Mario Hanyon

Mario Hanyon
(Bar No. 203993)
Attorney for Creditor
BROCK & SCOTT, PLLC
302 Fellowship Road, Ste 130
Mount Laurel, NJ 08054
Telephone: 844-856-6646 x4560
Facsimile: 704-369-0760
E-Mail: pabkr@brockandscott.com

21-02750 BKOBJ02

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**
Harrisburg Division

<p>IN RE:</p> <p>DWAYNE LEE CARR and NIURCA ZENAIDA CARR</p> <hr/> <p>Freedom Mortgage Corporation, Movant</p> <p>vs.</p> <p>DWAYNE LEE CARR and NIURCA ZENAIDA CARR, Debtor</p>	<p>Case No. 1:17-bk-00987-HWV</p> <p>Chapter 13</p>
--	---

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice Of Mortgage Forbearance Due To The Covid-19 Pandemic has been electronically served or mailed, postage prepaid on September 2, 2021 to the following:

DWAYNE LEE CARR
203 SUNSET DR
NEW CUMBERLAND, PA 17070-3062

NIURCA ZENAIDA CARR
203 SUNSET DR
NEW CUMBERLAND, PA 17070-3062

Kara Gendron, Debtor's Attorney
Mott & Gendron Law
125 STATE ST
HARRISBURG, PA 17101

Jack N Zaharopoulos, Bankruptcy Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

21-02750 BKOBJ02

United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101

/s/ Mario Hanyon
Mario Hanyon
(Bar No. 203993)
Attorney for Creditor
BROCK & SCOTT, PLLC
302 Fellowship Road, Ste 130
Mount Laurel, NJ 08054
Telephone: 844-856-6646 x4560
Facsimile: 704-369-0760
E-Mail: pabkr@brockandscott.com

21-02750 BKOBJ02